

# EXHIBIT A-2

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.*, Case No. 18-OP-45090

*The County of Cuyahoga v. Purdue Pharma  
L.P.*, Case No. 17-OP-45004

*City of Cleveland v. AmerisourceBergen Drug  
Corp.*, Case No. 18-OP-45132

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF STEVEN A. REED IN SUPPORT OF THE MANUFACTURER  
DEFENDANTS' JOINT MOTION TO DISMISS TRACK 1 PLAINTIFFS' CLAIMS FOR  
DAMAGES PURSUANT TO RULE 41(b)**

I, Steven A. Reed, declare as follows.

1. I am a partner at the law firm of Morgan, Lewis & Bockius LLP and counsel of record for Defendants Teva Pharmaceuticals USA, Inc., Cephalon, Inc., Watson Laboratories, Inc., Actavis LLC, and Actavis Pharma, Inc., in the above captioned matter. I am a member of good standing of the bar of the Commonwealth of Pennsylvania. I submit this declaration in support of the Manufacturer Defendants' Joint Motion to Dismiss Track 1 Plaintiffs' Claims for Damages Pursuant to Rule 41(b). I have personal knowledge of the following facts and, if called and sworn as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Discovery Ruling No. 1 issued in this matter and can be located on the docket at ECF No. 606.

3. Attached hereto as Exhibit 2 is a true and correct copy of a July 16, 2018 letter sent from Jodi Westbrook Flowers on behalf of the County of Summit and the City of Akron, Ohio.

4. Attached hereto as Exhibit 3 is a true and correct copy of a July 16, 2018 letter sent from Hunter J. Shkolnik on behalf of Cuyahoga County.

5. Attached hereto as Exhibit 4 is a true and correct copy of a July 16, 2018 letter sent from David J. Butler on behalf of City of Cleveland.

6. Attached hereto as Exhibit 5 is a true and correct copy of a July 27, 2018 sent from Steven A. Reed.

7. Attached hereto as Exhibit 6 is a true and correct copy of a July 31, 2018 letter sent from Hunter J. Shkolnik on behalf of the Track 1 Plaintiffs.

8. Attached hereto as Exhibit 7 is a true and correct copy of the transcript from the August 2, 2018 Status Conference held before the Honorable Dan Aaron Polster.

9. Attached hereto as Exhibit 8 is a true and correct copy of an October 11, 2018 email sent from Linda Singer.

I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed in Philadelphia, Pennsylvania on November 1, 2018.

/s/ Steven A. Reed

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